

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 31148 & \_\_\_\_

**ORDER GRANTING THE FTX RECOVERY TRUST'S MOTION FOR LEAVE TO  
FILE OMNIBUS REPLY TO THE OBJECTIONS TO FTX RECOVERY TRUST'S  
MOTION TO IMPLEMENT THE RESTRICTED JURISDICTIONS PROCEDURES IN  
POTENTIALLY RESTRICTED FOREIGN JURISDICTIONS**

Upon consideration of the *Motion of the FTX Recovery Trust for Leave to File Omnibus Reply to the Objections to the FTX Recovery Trust's Motion to Implement the Restricted Jurisdictions Procedures in Potentially Restricted Foreign Jurisdictions* (the “Motion for Leave”);<sup>2</sup> and the Court having reviewed the Motion for Leave; and the Court having determined that the legal and factual bases set forth in the Motion for Leave establish just cause for the relief granted herein; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court being able to issue a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion for Leave in this District is proper before the Court pursuant to

---

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used but not otherwise defined in this Order shall have the same meanings given to such terms in the Motion for Leave.

28 U.S.C. §§ 1408 and 1409; and the Court having found that notice of the Motion for Leave and the hearing thereon was sufficient under the circumstances; and sufficient cause appearing therefore;

**IT IS HEREBY ORDERED THAT:**

1. The Motion for Leave is GRANTED as set forth herein.
2. The FTX Recovery Trust is granted leave and permission pursuant to Local Rule 9006-1(d) to file the Reply, and the Reply is deemed filed and as a matter of record in the Chapter 11 Cases.
3. The Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: July 22, 2025  
Wilmington, Delaware

---

THE HONORABLE KAREN B. OWENS  
CHIEF UNITED STATES BANKRUPTCY JUDGE